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From: Jon A. Christopher <jac8792@tam2000.tamu.edu>
To: A16.A16(rm8775)
Date: 4/18/96 2:52pm
Subject: Ruling Concerning Voice on the Internet

APR 18 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

To whom it may concern:

I believe that voice transmissions on the Internet are a valuable and useful technology and should not be restricted. The drive to restrict this is solely based on self-interest by telecom companies.

When the telegraph replaced the pony express as the fastest and preferred method of communication, were telegraph companies restricted? No. The express carriers either adapted to the new technology or were forced out of business by the shift in demand for their services.

When the telephone became widely available, were regulations passed to favor the telegraph? No. Telegraph companies expanded and adapted to the technology or perished.

Similarly, there should be no regulation passed to limit voice communications to the telephone. Telephone companies should adapt to the new technology (and they are the most ideally suited to do so). Protectionist regulation would be in direct contravention of the principle of a market-driven economy, one of the fundamental building blocks of the American way of life.

Sincerely,
Jon A. Christopher

Visualize World Peace. (o o) "Drop your guns. Please."

-----ooO--()--Ooo-----
Jon A. Christopher, Dept of Chemistry, Texas A&M, jac8792@tam2000.tamu.edu
GS d?(-) s:- a- C++\$ U++\$ L E+ W+>+ N+ o? K+++ w-- M+\$ V-- PS+ PS Y PGP-
t++ 5 X R- tv b++ D-- G e++>++++ h+(-) r++@ y+**

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From: Jimmy Porter <jimmy@netdoor.com>
To: A20.A20(kwerbach)
Date: 4/18/96 5:00pm
Subject: Internet voice operation

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APR 18 1996

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Dear Sir:

I am a ham radio operatio who has been driven from the ham bands to the internet because of the failure of the F.C.C. to police the ham bands as provided by the rules.

The F.C.C. has basically abandoned the monitoring and inforcement of the rules governing amateur radio. I know a lot of this is because of cutbacks of funds and people within the F.C.C.. Also it is because the Justice Department will not bring the lawbrakers to trial.

Some of the ham radio operators have turned to the internet. There we may talk to whomever we wish, without being subjected to the vile language and the constant intentional interference.

It would appear to me that the F.C.C. has enough to do without trying to regulate the internet. Most of the voice conversations that are carried on winthi the internet are people talking to other people that they have just met, and a large portion are hams talking to other hams. I am sure there sre some that are using this for business, but they are in the minority.

It would be my wish as well as the wish of hundreds of thousands of other internet users, that the F.C.C. refrain from getting involved with the regulation of the internet. The internet is a hobby for a lot of us, and we are not costing the pjone companies and other communications companies to lose revenue. The only people to be served, should the F.C.C. Disallow the use of the socalled internet phones would be the big business interests.

If you are to have any input into this question, please include this small voice from the inter as being against the regulation by the F.C.C..

Thank you for your time and understanding.

James P. Porter

Amateur Radio W5HTV

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From: Ashok Kuppusamy <ashok@virginia.edu>
To: 'rm8775@fcc.gov' <rm8775@fcc.gov>
Date: 4/18/96 4:51pm
Subject: Internet Phone Communications

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Dear FCC,

Please do not attempt to regulate the internet phone communications technologies. The phone companies such as AT&T and MCI are merely trying to prohibit a true competitive marketplace from becoming a reality. The market is driving down the price of communication and the phone dinosaurs are fearing for their extinction. Please let the market decide what technology and communication media will prevail.

Thank You.

Ashok Kuppusamy

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From: <scratch@server1.softdisk.com>
To: A16.A16(rm8775)
Date: 4/18/96 5:58pm
Subject: rulemaking #8775

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This is in regard to the ACTA's request for the FCC to stop voice communications over the internet. This request is based totally in greed and is a slap in the face to all Americans who have paid ridiculously high long distance charges all of their lives. The impact of internet voice communication would be minimal both in dollars to the telecommunications companies and to the internet itself. Their claim that voice communication would be a threat to the internet through "overburdening" is completely false. The internet is by design expandable. THE ONLY THREAT TO THE INTERNET IS FCC REGULATIONS!!!!

Chris LeFebvre

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From: MDOCHTER.US.ORACLE.COM <MDOCHTER@us.oracle.com>
To: A16.A16(rm8775)
Date: 4/17/96 8:48pm
Subject: Fwd: Internet phones

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OFFICE OF SECRETARY

--Boundary-4409241-0-0

Regards
mdochter@us.oracle.com Doc
http://www.oracle.com ----- Mark "Doc" Dochtermann 500
Oracle Parkway, (415)506-0461 Bus Curriculum Planner Mailstop 659307, (415)633-3565 Fax Worldwide
Education Redwood Shores, CA (415)349-1509 Res Internal Training USA 94065
(415)269-9038 Cel -----

--Boundary-4409241-0-0
Content-Type: message/rfc822

Date: 17 Apr 96 11:45:57
From: "MDOCHTER.US.ORACLE.COM" <MDOCHTER.US.ORACLE.COM>
To: hm8775@fcc.gov
Subject: Internet phones
Cc: wwwusers
Reply-to: mdochter@us.oracle.com

The FCC should listen carefully to what the "people" want to do, and not interfere with the development of this new worldwide capability.

It is obvious that any voice traffic moved to the web would divert revenues away from the "TELCOS" worldwide. I suspect that this will cause a great deal of concern to these already profit rich organizations. They realize that their existing revenue base is slipping away to: electronic mail, web based applications, and now audio on the Web.

The Web will, I repeat WILL, however have a significant impact on the telecommunications industry. New products will be developed, integrating separate and diverse technologies into tomorrow's multimedia applications.

The FCC should NOT attempt to control/legislate/regulate/tax/ or even manage, what is happening here, that is unless they can move from a stance of control to a position of fostering development and creativity of the web - truly globalizing our communications capability.

It is not surprising that the FCC will, given the chance, assume control, and "hand-out" bandwidth, just as they do today with the "air waves". Hey, why not? This is an incredible revenue producing opportunity! The CRTC will then want their "piece of the action", and so will every other regulatory body on this planet..... and what about that Freedom of Speech clause in the Constitution of the United States of America?

Regards
mdochter@us.oracle.com Doc

http://www.oracle.com ----- Mark "Doc" Dochtermann 500
Oracle Parkway, (415)506-0461 Bus Curriculum Planner Mailstop 659307, (415)633-3565 Fax Worldwide
Education Redwood Shores, CA (415)349-1509 Res Internal Training USA 94065
(415)269-9038 Cel -----

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From: Sedmak Stephen A <sedmaks@odo.msos.edu>
To: A16.A16(rm8775)
Date: 4/17/96 10:03pm
Subject: Regulating Internet a mistake

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FEDERAL COMMUNICATIONS COMMISSION
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Remember -- the purpose of a democracy is to represent its citizens.
By crippling Internet the US government would worsen the lot for everyone.
That is not the purpose of the US government. The vast majority of concerned parties in this country want Internet to blossom.

DO YOUR JOB AND REPRESENT THE PEOPLE YOU'RE SUPPOSED TO SERVE!

Regulating Internet would be a mistake.

There is a 0% possibility that the FCC could regulate Internet without killing it. The government just moves waaaaay to slow to keep up.

Remember that only 2 years ago displaying images over the World Wide Web was a brand new technology. No one had even seriously considered real-time audio streams.

But only 2 years later static pictures on the WWW are old news and boring.
Now, real-time 2-way audio is an established reality. And real-time video is becoming plausible.

There is absolutely no way that the government could keep up with that furious pace of technological advance. Any attempts by the FCC to regulate Internet will do one of 2 things: fail, cripple Internet.

The ludites in the telecommunications industry want Internet telephony banned out of greed no matter the harm done to the citizens of this nation. This would not only ban Internet telephony, it would cripple Internet in its entirety.

Here's an analogy for you -- turn of the century horse breeders want to ban automobiles to protect their industry. Sounds stupid, right? Now automobiles are the choice mode of rapid transportation. Most people would shudder at the thought of being forced by the government to ride horses instead.

Tell me, what's the difference between that scenario and telecom companies wanting to cripple Internet?

There is no possible positive outcome from government regulation.
Internet is doing *excellent* on its own -- LEAVE IT THAT WAY!

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From: James Wagoner <James.Wagoner@internetMCI.COM>
To: FCC <rm8775@fcc.gov>
Date: 4/18/96 10:35am
Subject: Request for more information on Telemedicine Advisory

APR 18 1996

FEDERAL COMMUNICATIONS COMMISSION
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Where can I get more information about the formation of the Telemedicine Advisory Committee? Has it been formed? How can you make recommendations to it? Is there a way to make suggestions for members?

Thank you,

James

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From: Kevin Ross <Ross@grad.missouri.edu>
To: A16.A16(rm8775)
Date: 4/18/96 11:00am
Subject: Allow Internet Phones

I've heard you were soliciting comments on the subject of regulating companies providing mechanism which allows two stations to speak to each other over the internet.

I see no reason to regulate this practice. Internet phone conversations are packet based, not circuit-switched based. There is / can be delay between the conversation. It is not true full-duplex. If an individual is willing to put up with the lesser performance of an internet phone conversation rather than one that goes through the telephone switched system, why should we prohibit this?

Packet based systems with large bandwidth is the future. Let's not give the telephone companies the ability to rest on their laurels rather than invest in the technology upgrades.

Thanks for the opportunity,

Kevin Ross
Ross@grad.missouri.edu

BA, Computer Science, 1988
JD, 1993
MS Electrical Engineering 1996

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From: Bill Stewart-Cole <Bill@scconsult.com>
To: A16.A16(rm8775)
Date: 4/17/96 10:47pm

APR 18 1996

FEDERAL COMMUNICATIONS COMMISSION
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The recent ACTA petition to regulate the use of the Internet for voice communications is analogous to 19th century buggy-whip manufacturers attempting to force the regulation of steam-engine automobiles. For the FCC to step into this issue now would at least be premature, and would potentially be disastrous for the progress of efficient telecommunications technology.

The parties targeted by the petition are not providers of telecommunications services, they are providers of software. Use of that software requires customers to purchase telecommunications services from an Internet Service Provider (ISP) who may provide access via traditional phone lines or via a variety of other means such as ISDN or dedicated data lines. Those lines are almost always bought from a regulated local phone company. In the tiered structure of the Internet, the RBOC's and other local phone carriers sell a lot of short-haul service between end users, ISP's and bigger ISP's, and at the top providing long-haul and interconnect services are names very familiar to the FCC: Sprint, MCI, AT&T, Ameritech, etc. The physical lines use to carry Internet traffic are generally designed to meet traditional phone service needs, and can be retargeted as traditional phone lines if the carriers need to do so. In the final analysis, ISP's are reselling access to long-haul services, just as many of the ACTA members are. The software vendors targeted by the ACTA petition are NOT doing so, they are merely providing a tool for the end user to put voice communication on those communication lines. The cost of regulatory compliance is not evaded, as implied by the ACTA petition, it is merely spread out differently, and eventually paid for by the end user in a market which, unlike that for traditional phone service, is highly competitive and has little or no artificial cross-subsidy.

The ability to use the Internet for voice communication is a threat to ACTA primarily because it represents true healthy competition. The quality of the voice communication one can achieve with a standard phone line connection to the Internet and a party far away is far inferior in many ways to what any ACTA member would provide on their worst connections. This is reflected in the cost. However there are facets to such connections that make them preferable to traditional phone service. One of the most obvious positive features is that the connections, while tinny-sounding, are stable. There is no ebb and flow of static as lightning storms rage somewhere between the parties. The conversations are generally much harder to tap directly, adding a basic level of privacy, and can be encrypted to add an extremely high level of privacy. Traditional methods of using the same lines that carry the Internet cannot provide the trade-off of audio quality for convenience, privacy, and price that voice over the Internet can, and so it is clear why ACTA seeks protection.

Whether to bring regulation to the Internet on the premise of putting its use for voice under the the same burden as ACTA members bear is a public policy question. The Commission must consider what the effect of regulating or of NOT regulating would be in terms of current policy goals. Clearly one goal of federal communication policy for some time has been to encourage a competitive market for long distance (voice) phone service. This goal has been emphasized by the recent changes in statute. At first glance, it may appear that a threat to the viability of small long distance carriers is also a threat to that competition, but with a closer look it is not. Many, if not most, of the ACTA members do not actually provide long distance service, they resell the services of larger companies. While many of those are certainly doing so in good faith, in way that allow them to compete well and provide quality service that their larger competitors (and vendors) will not or cannot, many many others exist simply as a means for an unnecessary middleman to skim a little cash flow off of the torrent of money paid in this nation for phone service. In the worst case scenario for

ACTA, all voice communication will move to the internet, and traditional voice communication will be gone. Even in that unlikely event, there will still be what we have now: a handful of highly competitive companies providing land lines and microwave links carrying the nation's voice communications. They will be the same companies that do this now, they will simply be using different data protocols on the same basic infrastructure.

Not regulating may be the death of the current resellers of long-distance communications, but it will not eliminate or reduce the competition in the market of actually providing those long lines and microwave links. On the other hand, regulating the use of the Internet for voice communication is a step which would inevitably squelch competition, both between providers of a new technology (ISP's and software developers) and those providing an old technology, and between the ISP's and software providers themselves.

Currently ISP's and software providers compete with very little regulation and their competition has made for greatly enhanced services to consumers.

As recently as 1993, the concept of an average home user having a voice conversation across the nation using \$50 software and a \$20/month Internet account would have been laughable. Today it is a reality, largely because

competition has brought out the best in ISP's and software vendors. Slowing that with regulation at a time when it is barely started would be an attack on consumers and on the policy goal of a competitive communications market.

One final issue in the ACTA petition must be addressed : bandwidth. ACTA implies that somehow voice communications are a threat to the smooth operation of the Internet because they require so much data bandwidth. This is an argument that has been made many times before on the Internet about other uses. I first heard it said of Usenet News, the distributed "bulletin board" discussion system carried largely over the Internet. News now carries a volume 10 times greater than when I first heard that warning, and it uses a smaller fraction of the total bandwidth now. Similar dire warnings have been made about IRC (real-time textual 'chat') and the World-Wide Web with its heavy use of graphics. The Internet has survived and grown to meet every bandwidth challenge of the past. While it is true that there are today some signs of a bandwidth squeeze at the core, that is largely a direct effect of the past year's radical shifts in how traffic is carried and how networks interconnect, not of bandwidth demand outstripping supply. NSFNet, in some senses the 'backbone' of the Internet, was removed from general public use a year ago and it is certainly reasonable to expect that this has caused dislocation. The new interconnect systems are adapting and growing under competitive and demand growth pressures. The new structure shows every sign of adapting faster and better to bandwidth demands than the old system. For ACTA to suppose that consumer-oriented ISP's and their larger providers will not add connectivity and bandwidth to satisfy demand is absurd. The providers of long-haul data connections and interconnection services will certainly be pleased to add more lines and routing hubs as consumer-oriented ISP's scramble to fill their users' demands for less congestion and more versatile routing.

In summary, the ACTA petition is an attempt by the purveyors of an aging technology in a market long-hobbled by regulation to gain regulatory protection from a new technology arising in a market with healthy competition. The proper goal of the FCC is not to protect specific types of providers or means of providing service, it is to assure a healthy telecommunications market while maintaining universal access. The ACTA petition does not advance either part of that goal, and their requests for extending regulation should be denied.

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Bill Stewart-Cole